

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

FILED
JAN 07 2025
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____
DEPUTY CLERK

UNITED STATES OF AMERICA

VS.

NESLIHAN SIMSIK

§
§
§
§
§
§
§
§
§
§

CAUSE NO.: DR24-3168M

STIPULATION OF FACTS

The United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant U.S. Attorney, the Defendant, and Defense counsel hereby stipulate that if this matter were to proceed to trial, the United States would establish by legal and competent evidence the following facts beyond a reasonable doubt:

On October 16, 2024, **NESLIHAN SIMSIK** (Herein after "Defendant") unlawfully entered or attempted to enter the United States near Eagle Pass, Texas within the Western District of Texas, at a time and place other than that designated by United States immigration officials for the entrance of immigrants into the United States. The Defendant is an alien and citizen of Turkiye, The Defendant committed all of the foregoing acts knowingly and voluntarily with the specific intent to violate the law.

Respectfully submitted,

JAIME ESPARZA
United States Attorney

By:

JOSHUA B. BANISTER
Assistant United States Attorney

After consulting with my attorney, I hereby stipulate the above Statement of Facts is true and accurate, and had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt. **I accept responsibility for my actions in this case and apologize for having committed this offense.**

Signed this 5 day of January 2025 At-



NESLIHAN SIMSIK
Defendant

I am Defendant's Attorney, I have carefully reviewed the above Stipulation of Facts with the Defendant. To my knowledge, Defendant's decision to stipulate to such facts is informed and voluntary.

Signed this 5th day of January 2025 At-


SOSTENES MIRELES, II
Defendant's Attorney

Adopted and approved this _____ day of _____


ERNEST GONZALEZ
United States District Judge